

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

NICHOLAS KNOPICK,
Plaintiff

v.

**JOHN J. CONNELLY, JR.; SUSAN M.
KADEL; JAMES, SMITH, DURKIN &
CONNELLY, L.L.P.; and
PHILIP A. DOWNEY,**
Defendants

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NO.: 1:09 CV 01287

JUDGE SYLVIA H. RAMBO

CIVIL ACTION - LAW

**JURY TRIAL DEMANDED
(Electronically Filed)**

**CERTIFICATE OF MERIT AS TO
JOHN J. CONNELLY, ESQUIRE**

I, Dennis E. Boyle, Esquire, hereby certify that claims are raised under both subdivisions (a)(1) and (a)(2) of Pa.R.Civ.P. 1042.3. As to subdivision (a)(1), an appropriate licensed professional has supplied a written statement that there exists a reasonable probability that the care, skill or knowledge exercised by John J. Connelly, Esquire in the treatment, practice or work that is the subject of the Complaint fell outside acceptable professional standards and that conduct was a cause in bringing

about the harm. As to subdivision (a)(2), an appropriate licensed professional has supplied a written statement that there exists a reasonable probability that the care, skill or knowledge exercised or exhibited by other licensed professionals for whom John J. Connelly, Esquire is responsible, in the treatment, practice or work that is the subject of the Complaint, fell outside acceptable professional standards and that such conduct was a cause in bringing about the harm.

BOYLE, NEBLETT & WENGER

/s/ *Dennis E. Boyle*

Dennis E. Boyle, Esquire

Supreme Court I.D. No. 49618

Joshua M. Autry, Esquire

Supreme Court I.D. No. 208459

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Counsel For: Plaintiff

Dated: September 2, 2009

CERTIFICATE OF SERVICE

I hereby certify that on the date listed below I electronically filed the foregoing with the Court using the CM/ECF system, which sent notification of such filing to the following person(s) at the following email address(es):

Edwin A.D. Schwartz
[easchwartz@mdwcg.com](mailto: easchwartz@mdwcg.com)

And I hereby certify that I have mailed by United States First Class Mail the document to the following person(s) at the following address(es):

Philip A. Downey, Esquire
1555 Embreeville Road
Unionville, PA 19375

/s/ Penny A. Rogers
Penny A. Rogers, Paralegal

Dated: September 2, 2009